

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Criminal Case No. 6:21-CR-1</b>
	)	
<b>JERMEL STOREY, <i>et al</i>,</b>	)	
	)	

**UNITED STATES' NOTICE OF USE OF EXPERT WITNESSES**

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), the United States of America hereby provides notice to the defendants that the United States intends to call George Edward Ott, III, a Special Agent with the Drug Enforcement Administration, as an expert witness at trial.

At trial, the government will seek to qualify Special Agent Ott as an expert on the topic of controlled substances and related criminal activity, such as the nature, methods, techniques, communications, investigations and customs associated with the illegal drug trade in general, with a focus on cocaine in particular. The government anticipates Special Agent Ott's testimony will also address units of sale, dosage amounts and methods, physical appearance, odors, cutting agents (e.g. Inositol), packing techniques, price structures (i.e. wholesale, ounces, user) and payment and "fronting" practices, communication methods, the use of firearms in the criminal drug trade, the use of "stash houses," and transportation/trafficking of drugs. Special Agent Ott will discuss the use of cocaine kilogram presses and the use of "stamps" on kilograms of cocaine. Finally, the government anticipates Special Agent Ott will testify about specific terminology used in narcotics trafficking, including, but not limited to, terms such as "work," "fire," "brick," "8-ball," as well as street terms for certain drugs and terms to describe different quantities thereof and the use of coded language.

The United States anticipates this witness will testify, based upon his extensive personal

experience and training, which includes participation in drug enforcement training, in-service programs and his participation in numerous drug investigations, the amount of drugs seized from the defendants in this case was inconsistent with personal use, and consistent with an intent to distribute. He has made a considerable number of drug arrests, drafted and executed numerous drug search warrants, seized and handled illegal narcotics (including cocaine), seized and handled firearms in connection with drug investigations, and has debriefed or reviewed debriefings of numerous drug users and drug traffickers/distributors. A copy of his curriculum vitae is attached.

In the event defense counsel wishes to meet with Special Agent Ott prior to his testimony to discuss his opinions the government is willing to arrange such a meeting. Defense counsel should contact the government to arrange a suitable date and time for the parties involved.

WHEREFORE, the United States respectfully submits this notice pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G).

Respectfully submitted,

CHRISTOPHER R. KAVANAUGH  
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice has been provided via electronic means via the Court's CM/ECF filing system to counsel for the defendants, this 10<sup>th</sup> day of August, 2022.

/s/Ronald M. Huber  
Assistant United States Attorney